UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

v.

D-1 ZAINAB ALIASGAR HAKIM
(a/k/a "Z")
D-3 PAIGE ELIZABETH FEYOCK
D-4 AHMET KEREM KORKAYA
D-5 JONATHAN HONGRU ZOU
D-8 COLIN HUNTER WEGER
(a/k/a "Beams"),

Defendants.

CRIMINAL NO. 26-20306

Honorable Judith E. Levy
Honorable Anthony P. Patti

United States' Brief in Support of Detention Hearing set for June 12, 2026

This prosecution is not about a lawful right to protest. It is not an attempt to punish defendants for their viewpoints. The Grand Jury returned an indictment based on evidence that the conspirators violated federal law tenfold. And they knew perfectly well they were committing criminal acts because they repeatedly joked about it in private conversations. To be clear, these threats were not just "talk" or "blowing off steam." The conspirators stalked their targets by following them on and off campus, performing online research, identifying their cars, and

discussing ways to harm them and their families. In the dark night, (to appear more threatening, according to them), they traveled to various locations across Michigan to destroy homes and businesses by spray painting threatening symbols and messages. They taped demand notes on the victims' doors. They broke windows and threw glass jars filled with noxious chemicals into family homes while children slept. They damaged door locks, security cameras, and cars. They posted their conquests on social media to threaten the victims and warn those complicit with their targets that they would be next.

No condition or combination of conditions will reasonable assure the defendants' appearance or the community's safety. This Court should detain these defendants pending trial.

I. Background

The indictment in this case details some of the conspirators' criminal conduct, but not all. The United States proffers some additional details of the charged conduct as to the defendants for which detention is sought, as well as other uncharged conduct, for the Court's consideration.

To be clear, all defendants knew and supported all the charged criminal acts. The indictment (ECF No. 1) is incorporated here by reference.[1]

References to the Palestinian/Israeli conflict give context for the conspirator's specific intent. But the evidence shows that the defendants are ardent supporters of Hamas and utilize Hamas' messaging to threaten their victims. For example, compare these photos below. The top left photo shows the infamous photo from the Ramallah Lynching of 2000, where two Israeli reserve soldiers were murdered and mutilated during the Second Intifada. One of the killers proudly waved bloodied hands to the cheering crowd as proof the Israeli men had been killed.

The top right photo is a screenshot from Korkaya's electronic device. It is a typical Hamas propaganda video showing the terrorists using an inverted red triangle to mark targets for death. As the video proceeds, the weapons deploy and kill the targets. Zou and other conspirators also traded and possessed various Hamas killing videos.

Now, compare the top two pictures to the bottom two. On the left is a photo of defendant Amatullah Hakim, found on Zainab Hakim's phone. On the bottom right is a close-up photo of one of the vandalized

[1] Some of the online postings appear as Exhibit A to this filing.

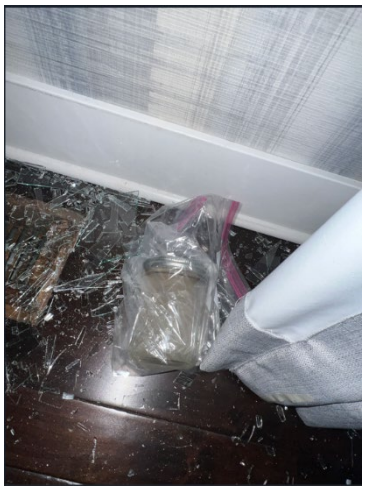
locations. Note how the conspirators mimic the symbols to threaten their targets.

A. Count Two – threats against V-2 (Hakim, Feyock)

Conspirators gave V-2, a University of Michigan Regent, special attention. They destroyed his law firm's building, they showed up at his personal residence three separate times. They also engaged in a flier

campaign to smear his reputation on campus. The photos below show the destruction at V-2's law firm, done in preparation for the online threat more fully explained in Count One of the indictment.

In November 2024, Zainab Hakim and UCC-8 discussed stealing V-2's car. But instead, in December 2024, conspirators decided to sneak on to V-2's personal residence property in the middle of the night. Jonathan Zou, Zainab Hakim, Paige Feyock, and others defaced V-2's car. They threw two clear mason jar "bombs" containing butyric acid at his window, breaking the window. One of the "bombs" landed inside the home.



Zainab Hakim and other conspirators also engaged in photoshopping V-2's photos with disgraced individuals, using disparaging titles such as "#1 pimp" and "foreign-funded agent." Hundreds of the images were superglued on surfaces all around the University campus. Zainab Hakim called it the "easiest vandalism ever."

B. Count Three – threats against Rolls Royce (Hakim, Feyock, Korkaya, Weger)

Ahmet Korkaya wanted to participate in the conspiracy's criminal acts so much that he drove from Milwaukee to Ann Arbor to do so. Below are some pictures of the damage. These were later posted, in part, online with additional threats, as noted in Count Three.

C. Count Four – threats against Maersk (Hakim, Weger)

The conspirators called all these types of acts "red actions," as opposed to "green" (legal) or "yellow" (questionable). Without any regard or respect for anyone else's property, the destruction continued. And the conspirators were proud of it, as evidenced by the threats posted on line for the world to see.

D. Counts Five, Six, and Seven (Hakim, Feyock, Korkaya, Zou)

On the one year anniversary of Hamas' attack on Israel, the conspirators "celebrated" by attacking the University of Michigan's Chief Investment Officer's home (V-3), the University President's home (V-4) and the Jewish Federation of Detroit. After the crime spree, they bragged online posting additional threats, as described in the indictment.

FUCK
ISRAEL
FREE PALESTINE

E. Count Eight – threats to V-5 (Hakim, Feyock, Korkaya)

The conspirators also expressed a general hatred toward any law enforcement officer. And they targeted and threatened one particular

officer they knew from campus, as described in Count Eight in the indictment.

F. Additional criminal activity

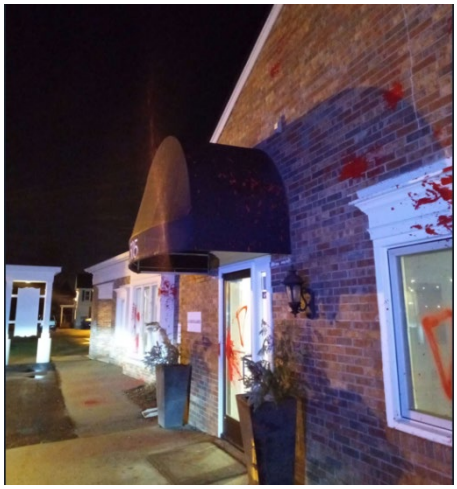
The conspirators did not stop there. Zainab Hakim and Jonathan Zou, along with defendants Amatullah Hakim, Alex Sepulveda, UCC-8, and others, also vandalized V-7's house, as described in Count Ten of the indictment.

In March 2025, Zainab Hakim, Amatullah Hakim, Jonathan Zou, and others performed "red actions" at First Financial Strategies and the Raymond James building, both in Plymouth, and both believed to be associated with another University of Michigan Regent. Photos appear below.

V-7's house

First Financial

Raymond James



II. Applicable Law

Defendants have been charged with conspiracy to transmit threats over interstate and foreign commerce, in violation of 18 U.S.C. §§ 371; 875(c). The defendants' detention is properly sought under 18 U.S.C. §3142(f)(2)(A) and (B), as this case involves both a serious risk that the defendants will flee; and a serious risk that the defendants will obstruct or attempt to obstruct justice, or threaten, injure, or intimidate (or attempt to do so), a prospective witness.

Under the Bail Reform Act, the Court shall order a defendant detained pending trial if "no condition or combination of conditions will reasonably assure the appearance of the person as required and the safety of any other person and the community." 18 U.S.C. § 3142(e). In determining whether any such conditions exist, the Court must consider four statutory factors: (1) the nature and circumstances of the charged offense, including whether it involves a firearm; (2) the weight of the evidence against the person; (3) the history and characteristics of the person, including past conduct and criminal history; and (4) the nature and seriousness of the danger to any person or the community that would be posed by the person's release. 18 U.S.C. § 3142(g). The government

bears the burden of proving risk of flight by a preponderance of the evidence, and danger to the community by clear and convincing evidence. *United States v. Hinton*, 113 Fed. App'x 76, 77 (6th. Cir. 2004) (citing *United States v. Cisneros*, 328 F.3d 610, 616 (10th Cir. 2003)); 18 U.S.C. § 3142(f).

III. Zainab Hakim: additional facts and 18 U.S.C. § 3142(g) factors

A. Additional pertinent facts (Hakim)

Zainab Hakim acted as the ringleader for the "movement." According to her, "i think divestment is def [definitely] the goal but in the sense that it brings about revolutionary change and more activism / it's a means as much as an end." (June 5, 2024). She expressed concern that their actions would have only a limited impact on divestment and possible "overthrow and revolution."

Zainab Hakim was heavily involved in drafting statements and organizing individuals for actions. Her Signal chats demonstrate that she participated and managed posts for the @tahrirumich Instagram and Twitter/X site.

She recruited others to participate. Paige Feyock called her a "mafia boss." She expressed Hamas support in a variety of ways. For

example, she wrote chants for the group such as: "al Qassam make us proud / force another settler out / IOF burn in hell / gaza called, yemen answered / all Israeli ships are cancelled," and "al Qassam free the skies / make the Zionist settlers cry." To be clear, Hakim enjoys a First Amendment right to say what she wants. But there is no way to interpret chants like this except as direct support for Hamas (the Al-Qassam brigade is Hamas' military arm) to mass murder Israelis.

Anyone that stands in Zainab Hakim's way appears to become a target. For example, the conspirators butted heads with the then-President of the student body regarding divestment initiatives. Hakim asked her conspirators about "how to ruin his life in the long run." The group then began to "stalk" the individual to identify his car, his house, and his family's house for future "actions."

B. Factors under 18 U.S.C. § 3142(g) support detention.

1. Nature and circumstances of the offense charged and weight of the evidence for detention

The nature and circumstances of this offense are undeniably serious. Zainab Hakim led the charge to instill fear, threaten, and intimated close to a dozen individuals. The weight of the evidence for detention is strong. The conspirators engaged in a sophisticated system

of coding conversations, using special encrypted devices, attempting to cover their tracks at every turn, and working toward a total "revolution."

A grand jury indicted Zainab Hakim for witness intimidation. She has already demonstrated that she will interfere with the law to get the results she seeks. For that alone, this Court should detain her pending trial.

2. History and characteristics

Zainab Hakim indoctrinated herself with the Hamas-supported mindset. She is proud of her criminal acts. She and Amatullah Hakim even photographed themselves after vandalizing and posting threats to V-2:

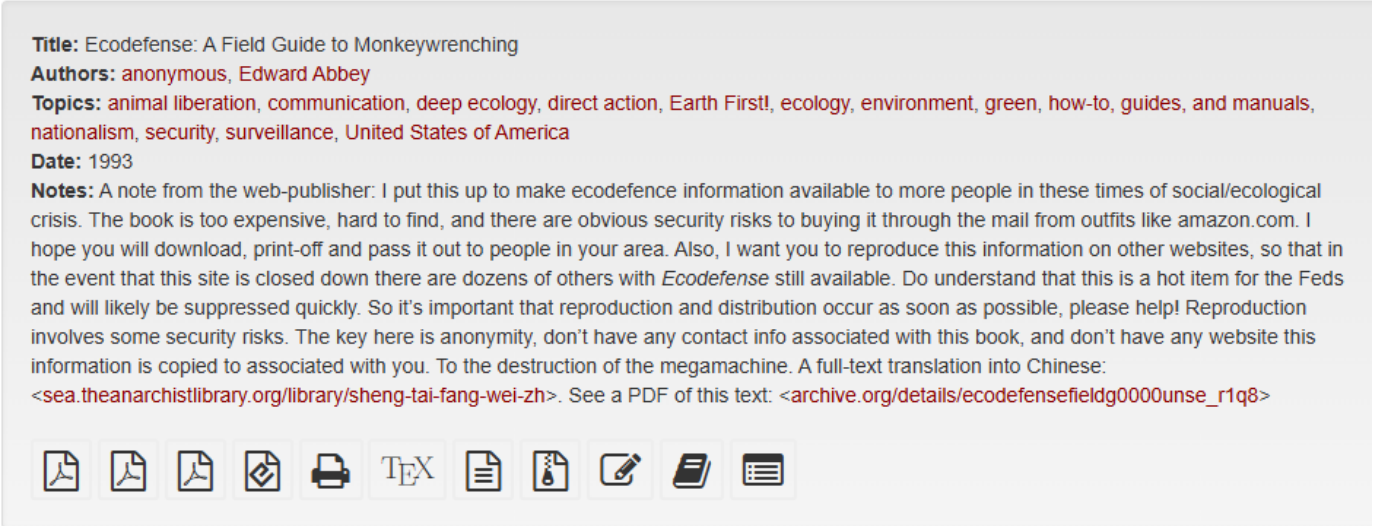
The Court should be concerned about the fact that Zainab Hakim hides behind a "peaceful protester" claim and believes that she is being

punished for "supporting Palestine." She has repeatedly engaged in criminal activity, and she knows she has, based on the conspirators' discussions. For example, after the October 7, 2024 threats, she asked Paige Feyock to research "geofencing" and determine the likelihood that law enforcement would identify them.

Zainab Hakim has international ties. She has traveled extensively around the world. Between 2022 and present, her travels included France, Jordan, Amsterdam, Mexico, Canada (multiple trips), and Germany. She has family in India. Her sister and codefendant is currently in India. She and her family have financial resources.

3. Nature and Seriousness of Danger to any Person or Community if Defendant is Released

This defendant's steadfast belief that she is supporting a righteous cause and has not done anything wrong is exactly what makes her dangerous. She reads manuals to include "Ecodefense: A Field Guide to Monkeywrenching," an anarchists' guide to committing crimes aimed at overthrowing governments. From the publisher:



Title: Ecodefense: A Field Guide to Monkeywrenching
Authors: anonymous, Edward Abbey
Topics: animal liberation, communication, deep ecology, direct action, Earth First!, ecology, environment, green, how-to, guides, and manuals, nationalism, security, surveillance, United States of America
Date: 1993
Notes: A note from the web-publisher: I put this up to make ecodefence information available to more people in these times of social/ecological crisis. The book is too expensive, hard to find, and there are obvious security risks to buying it through the mail from outfits like amazon.com. I hope you will download, print-off and pass it out to people in your area. Also, I want you to reproduce this information on other websites, so that in the event that this site is closed down there are dozens of others with *Ecodefense* still available. Do understand that this is a hot item for the Feds and will likely be suppressed quickly. So it's important that reproduction and distribution occur as soon as possible, please help! Reproduction involves some security risks. The key here is anonymity, don't have any contact info associated with this book, and don't have any website this information is copied to associated with you. To the destruction of the megamachine. A full-text translation into Chinese: <sea.theanarchistlibrary.org/library/sheng-tai-fang-wei-zh>. See a PDF of this text: <archive.org/details/ecodefensefieldg0000unse_r1q8>

In short, no condition or combination of conditions will assure her presence in a court she believes is corrupt, and no condition or combination of conditions will assure the safety of the community that she believes is "fascist," "imperialist," and "colonialist." She should be detained.

IV. Paige Feyock: additional facts and 18 U.S.C. § 3142(g) factors

A. Additional pertinent facts (Feyock)

Paige Feyock frequently acted as countersurveillance for the conspirators. She had access to a police scanner and used it frequently. She offered to research law enforcement tactics to assure others they would be undetected because the FBI were not smart enough. She also noted to a group that she was posting for SAFE on Twitter. And she, too, expressed a desire to engage in violent activity.

Feyock and Ahmet Korkaya had multiple discussions regarding such activity. More alarming is the fact that Korkaya is a medical student, studying to be a doctor. Feyock was a pre-med student who also served as a doula for laboring mothers.

The pair discussed firebombing the University of Michigan, driving a car into the University President's house, and maintaining a presence on campus to make the Regents "feel scared." The discussion regarding their desire to kill their enemies – particularly U of M administrators – is chilling:

Korkaya: I'm going to terrorize that Ozempic bitch

Feyock: I won't stop until she kills herself

Korkaya: No actually that's what my last night in ann arbor will be . . . . her death.

(May 21, 2024). Feyock suggested they go after Regents' "kids." Korkaya agreed that it was "the only way to clear my conscious [sic]." The pair continued to discuss taking a Regent hostage, "make her walk around campus naked . . .shouting shame" and then "shave her head." (May 21, 2014).

Feyock and Korkaya wanted to "build something" like Weather Underground, the domestic terrorist organization from the 1960s. Both

agreed that if the "feds figure out how to get back all those disappeared signal messages," it's "over." Feyock thought the comment was funny.

Feyock also discussed "firebombing" the University of Michigan with UCC-1. She said she was going to firebomb a new building on campus to "make a point." She believed that there was "nothing redeemable" about the University of Michigan.

Feyock also supported burning a cross in the front yard of a "brown" professor. When asked if that was what the KKK did, Feyock responded, "it sends a message…..they were onto something." Feyock further fantasized, "imagine how scary it would be to see a burning cross in your yard . . . ." (September 3, 2024).

B. Factors under 18 U.S.C. § 3142(g) support detention.

1. Nature and circumstances of the offense charged and weight of the evidence for detention

The nature and circumstances of this offense are undeniably serious. The weight of the evidence for detention is strong here. The groupthink mentality of the conspirators demonstrates their steadfast disdain for the law. For example, when search warrants were executed at Feyock's residence in April 2025, she refused to open the door. Instead, her and her roommate demanded to inspect the warrant before

complying. After the fact, @tahrirumich claimed the searches to be illegal.

2. History and characteristics

Feyock conspired with Zainab Hakim to intimidate a witness, for which both are charged in Count Nine of the indictment. In short, Feyock has already shown the Court what she thinks of the law.

The defendant has medical school aspirations. And she is currently working in the University of Michigan health system with access to patients. But the evidence shows that she openly despises "Zios," white people, and other individuals that think differently than she does. Would any of those patients be safe in her care?

3. Nature and Seriousness of Danger to any Person or Community if Defendant is Released

Feyock and others believe they are above the law. This Court must consider Feyock's depraved discussions involving murder, as well as the groupthink mentality of this "movement." She should be detained pending trial.

V. Ahmet Korkaya: additional facts and 18 U.S.C. § 3142(g) factors

A. Additional pertinent facts (Korkaya)[2]

Korkaya believes bombing is in his "true nature." He affirmatively stated that he is "going so militant" because "I hate it here." On his list of places to see and things to do in his Apple notes: "Fucking up UMich Campus" and "Ahmet's Special Surprise." (December 24, 2023).

Korkaya continues to support Hamas and express a hatred for "Zionists." When law enforcement executed a search warrant at his Milwaukee apartment on June 10, 2026, the found a Hamas flag on his wall, and a painting of a beheaded Benjamin Netanyahu, Prime Minister of Israel.

[2] The United States incorporates by reference its Motion for Bond Appeal concerning Korkaya, ECF No. 17. Korkaya is not the subject of Friday, June 12, 2026's combined hearing.

B. Factors under 18 U.S.C. § 3142(g) support detention.

1. Nature and circumstances of the offense charged and weight of the evidence for detention

The nature and circumstances of this offense are undeniably serious. As to Korkaya, his depraved attitude toward the United States, "Zios," and anyone who supports them should be a grave concern to this Court. The weight of the evidence for detention is strong.

2. History and characteristics

Korkaya wants to be "the dirtiest fucking doctor ever." He told Paige Feyock: "I keep thinking pediatric EM [emergency medicine] and then joining hamas medical wing." He is currently in medical school and works at a local hospital. In November 2024, the two aspiring doctors (Korkaya and Feyock) determined that Korkaya's medical school was worth bombing because of a pro-life club on campus. Feyock insisted it was Korkaya's "civic duty" and offered to help him.

He has traveled internationally extensively. In the last three years, he traveled to Egypt, Canada, India, and the Netherlands. He appears to have financial means. And he has a photo in his iCloud records of what appears to be a "Foreign Residence Card" from the Arab Republic of Egypt. The photo is from 2021, but the card does not appear to have an

expiration date. He is a naturalized U.S. citizen, but still has his exppired Turkish passport. In fact, according to Korkaya, he has family in the Turkish government.

3. Nature and Seriousness of Danger to any Person or Community if Defendant is Released

Can any patient feel safe and trust a medical professional who has photos like this in his phone?

This defendant is willing to make a seven-hour one-way drive just to commit crimes against his enemies. But he's willing to do it more than once. Korkaya "hates it here." He does not believe in the rule of law.

VI. Jonathan Zou: additional facts and 18 U.S.C. § 3142(g) factors

A. Additional pertinent facts (Zou)

Jonathan Zou is an ardent supporter of Hamas. He subscribes to multiple terrorist newsgroups on Telegram and Signal, receiving almost

a constant flow of American and Jewish hate. When UMPD arrested Zou for an incident on campus, a conspirator stated that he was their "strongest soldier."

Zou has extensive international ties. In 2024, he flew to Taiwan. He continued his international travels, with his phone indicating he went to Wuhan, China. Three months later, he boarded a plane in Istanbul, Turkey and flew to Detroit. In 2025, he traveled to Korea, but returned home about a month later through Xiamen, China. Zou is believed to be a dual Chinese/American citizen. He maintains ties with family in China.

In 2024, Zou received a campus ban for his behavior during a campus protest. But he ignored it. Instead, he disguised himself as a Muslim woman to avoid being seen. Both he and his conspirators thought it was hilarious and joked about his illegal behavior.

B. Factors under 18 U.S.C. § 3142(g) support detention.

1. Nature and circumstances of the offense charged and weight of the evidence for detention

As noted, the nature and circumstances of this offense are undeniably serious. The fact that Zou and his conspirators believe all of their criminal acts to be humorous just underscores the fact that he cannot be trusted to follow any conditions. The weight of the evidence

for detention is strong.

2. History and characteristics

The defendant's ties to China include family, friends, and even a separate phone for communications. He has traveled to the country numerous times. He participated in several "red actions" for the conspiracy. He shows a Hamas loyalty. And he alerted other conspirators of the law enforcement search warrants in April 2025. He cannot be trusted to follow any conditions set by this Court.

3. Nature and Seriousness of Danger to any Person or Community if Defendant is Released

Zou is dangerous because he has flooded his world with Hamas-inspired violence. His phone shows a constant stream of hateful material, including chats encouraging, "death to the Jewish mold!," "death to the Jewish bastards!" and glorifying mass murder by circulating videos, calling for "death to the nation of thieves and killers."

VII. Colin Weger: additional facts and 18 U.S.C. § 3142(g) factors

A. Additional pertinent facts

Colin Weger set his sights on the companies that had perceived ties to Isreal, such as Rolls Royce and Maersk. He was eager to participate in actions with the conspirators. Weger was not a University of Michigan

student. He appears to be leaning in to both the pro-Hamas conspirators as well as general anarchy.

He spent time at the "war house," a known residence in Ypsilanti where individuals gathered for criminal training on both tactical issues and electronic issues. In 2024, Weger purchased an AK-47 along with a silencer. He has purchased various tactical gear, scopes and lasers for firearms. He has recently purchased range time at a local gun range. In March 2024 and July 2025, Weger spent approximately $400 on various flags, patches and stickers reflecting various terrorist, militant and communist groups, including:

- Armenian Secret Army for the Liberation of Armenia (flag)
- TIKKO – Communist party of Turkey insurgent org (patch)
- People's Liberation Guerrilla Army PGLA Communist Party of India (patch)
- Chinese Red Guards (headband)
- New People's Army (communist party of Philippines) (patch)
- Economic Freedom Fighters South Africa (patch)
- Sendero Luminoso - Maoist guerrilla terrorist organization (teeshirt)
- IRPGF International Revolutionary People's Guerrilla Forces (patch)
- "Tie me to a missile and fire it at Tel Aviv" (Hamas saying; sticker)
- PFLP Popular Front for the Liberation of Palestine (headband and patch)

- Abu Ali Mustafa Brigades (patch)

FBI executed a search warrant at his location on June 10, 2026. None of the firearms were at the residence.

B. Factors under 18 U.S.C. § 3142(g) support detention.

1. Nature and circumstances of the offense charged and weight of the evidence for detention

The nature and circumstances of this offense are undeniably serious. For Weger, the weight of the evidence for detention is strong because of his buy-in to both Hamas inspired thinking and his overall anarchist desires. His purchase of firearms, gear, and "historical memorabilia" from known terrorist groups presents red flags as to his dangerousness.

2. History and characteristics

Weger's history and characteristics warrant detention. Engrossed in the mix of the conspirators and committing criminal acts, Weger eagerly offered to assist and offered additional locations to destroy, such as breaking large construction equipment by using heavy duty tools. Weger was "more than happy to do research" on CAT machines. His desire to ignore the law and do as he desires warrants his detention.

3. Nature and Seriousness of Danger to any Person or Community if Defendant is Released

The access to firearms (and a silencer), as well as Weger's willingness to commit destructive acts and threaten others should be a serious concern to this Court. No condition or combination of conditions can reasonably assure the safety of the community. He should be detained.

VIII. Conclusion

The United States will proffer additional information and argument at the hearing on June 12, 2026. This Court should detain the defendant pending trial.

Respectfully submitted,

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Dated: June 11, 2026

Certificate of Service

I certify that on June 11, 2026, I electronically filed the foregoing Response and Brief in Support with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Attorneys of record

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